

Message

From: Pickrel, Jan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AAB6AA55A0C84312B076BD4A5B75BAF3-JPICKREL]
Sent: 5/31/2017 6:53:00 PM
To: Lindstrom, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=04bf7cf26aa44ce29763fbc1c1b2338e-Lindstrom, Andrew]; Libelo, Laurence [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=da33642e6438407daf4c35afe870046b-Libelo, Laurence]
CC: Strynar, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5a9910d5b38e471497bd875fd329a20a-Strynar, Mark]
Subject: RE: DuPont discharges

For the tracking of what is shipped offsite, RCRA [and DOT, for the trucking portion of the journey] should know what has to be reported and how things are disposed.

We'll need to find contacts in RCRA for more of the "cradle to grave".

From: Lindstrom, Andrew
Sent: Wednesday, May 31, 2017 1:55 PM
To: Libelo, Laurence <Libelo.Laurence@epa.gov>; Pickrel, Jan <Pickrel.Jan@epa.gov>
Cc: Strynar, Mark <Strynar.Mark@epa.gov>
Subject: RE: DuPont discharges

Jan and Laurence,

Thank you very much for helping us out with this.

It seems sort of like money laundering except this would be waste laundering or obfuscation.

I guess they are required to keep records and should be able to track what goes where, but for all practical purposes, it seems lost once it gets offsite.

Somebody else's problem, someplace else.

In the TRI link that Jan sent, I see fluorinated materials ending up at Clean Harbors in Arkansas and in NJ Deepwater. I doubt they even know completely what is in the waste they ship out.

Shouldn't we be able to figure this out? If we can't maybe nobody can.

Thank you very much,

Andy

From: Libelo, Laurence
Sent: Wednesday, May 31, 2017 12:29 PM
To: Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>; Pickrel, Jan <Pickrel.Jan@epa.gov>
Cc: Strynar, Mark <Strynar.Mark@epa.gov>
Subject: RE: DuPont discharges

I have a faint recollection of a discussion of sending wastewater to Deepwater, NJ to be treated but can't find any documentation of that. Still looking.

From: Lindstrom, Andrew
Sent: Wednesday, May 31, 2017 10:04 AM
To: Pickrel, Jan <Pickrel.Jan@epa.gov>
Cc: Libelo, Laurence <Libelo.Laurence@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>
Subject: FW: DuPont discharges

Jan,

Thanks for helping us figure out what's going on in Fayetteville. On page 33 of this NPDES renewal application (attached above) the second paragraph states:

Chemours Polymer Processing Aid ("PPA") Manufacturing Area:
The Chemours Company — Fayetteville Works' PPA manufacturing area produces a polymer processing aid. The processing aid produced in this unit is used in the manufacturing of fluoropolymers and fluorinated telomers, but none of the produced processing aid is used at the Fayetteville Works site. All process wastewater generated from this manufacturing facility is collected and shipped off-site for disposal. No process wastewater from this manufacturing facility is discharged to the Chemours' wastewater treatment plant or to the Cape Fear River.

We're looking for where these polymer processing aid wastes are shipped to and how they are disposed.

We're measuring what we think is this polymer processing aid is (called GenX) in the Cape Fear River below their discharge and it is ending up in the finished drinking water in Wilmington, North Carolina. The concentrations in the drinking water are almost 10 times higher than the current Health Advisory for PFOA which suggests some reason for concern.

The North Carolina DEQ does not have information available concerning the fate of this waste stream.

If you could help us find out where this waste stream is going we would appreciate it very much.

Thank you very much,

Andy

From: Libelo, Laurence
Sent: Tuesday, May 30, 2017 5:05 PM
To: Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>
Subject: DuPont discharges

Andy,

I asked OW where the Fayetteville wastewater goes. Here is their response.

From: Pickrel, Jan
Sent: Tuesday, May 30, 2017 4:41 PM
To: Libelo, Laurence <Libelo.Laurence@epa.gov>
Subject: RE: NPDES permit question

Yes – Chemours in Fayetteville, NC has an NPDES permit. I found this by using the "TRI Search" feature of the DMR Pollutant Loading Tool.

This does not EXCLUDE whether or not they have a pretreatment permit. It merely means that IF they discharge to the POTW, they do not have to report that wastestream to TRI.

The NPDES Permit number of the facility is: **NPDES ID:** NC0003573.

Apparently, this facility also does business as "Kuraray America".

The ECHO page <https://echo.epa.gov/detailed-facility-report?fid=28302DPNTFHIGHW> identifies that they have CAA, RCRA, SWDA, and CWA permits.

Outside of asking the Region or State if they know about a discharge to the POTW, what more information can I help you with?

--Jan
(202) 564-7904

Screenshot of the EPA's Discharge Monitoring Report (DMR) Pollutant Loading Tool interface.

Discharge Monitoring Report (DMR) Pollutant Loading Tool

Note: The tool uses discharge monitoring report (DMR) data from ICIS-NPDES to calculate pollutant discharge amounts. EPA has verified the accuracy of the tool's calculations. EPA has also performed a limited review of the underlying data that has focused on facilities with the largest amounts of pollutant discharges. Due to the large amount of DMR data, some errors exist in ICIS-NPDES DMR data. Please see the User Guides page for instructions on how to use the tool and how to correct errors in ICIS-NPDES. The tool also uses wastewater pollutant discharge data from the Toxics Release Inventory (TRI). Contact Us with any comments or questions about the tool, and sign up for our e-mail news bulletin to be notified when new data, enhancements, or training materials become available.

Search criteria:
Reporting Year: 2015 and State: NORTH CAROLINA and City: 'Fayetteville' and All pollutants and All industries

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Browse All Facilities

TRI ID	Facility Name	City, State	Direct Discharges Only	Indirect Discharges Only	Both Direct and Indirect Discharges	Link to NPDES Permit	Discharges Reported to TRI and ICIS-NPDES
28306WSTNG2900D	EATON CORP	FAYETTEVILLE, NC	No	Yes	No	Yes	No
28311W5WEYT1395U	S&W FAYETTEVILLE PLANT	FAYETTEVILLE, NC	No	No	No	Yes	No
28311KLLYS6650R	THE GOODYEAR TIRE & RUBBER CO FAYETTEVILLE PLANT	FAYETTEVILLE, NC	No	No	Yes	Yes	No
28302CMRCSPOBOX	DAK AMERICAS LLC	FAYETTEVILLE, NC	Yes	No	No	Yes	Yes
28301NCPRD396CE	OLDCASTLE PRECAST INC	FAYETTEVILLE, NC	No	No	No	Yes	No
28302CRCLLAYER	CARGIL INC	FAYETTEVILLE, NC	No	Yes	No	Yes	No
28302BRDNN1411I	HEXION INC-FAYETTEVILLE FACILITY	FAYETTEVILLE, NC	No	No	Yes	Yes	No
28302DPNTRFHIGHW	CHEMOURS CO - FAYETTEVILLE WORKS	FAYETTEVILLE, NC	Yes	No	No	Yes	Yes
28302CPFRP1309I	VALLEY PROTEINS, INC - FAYETTEVILLE FACILITY	FAYETTEVILLE, NC	No	Yes	No	Yes	No
2830WKRRYM22824	KURARAY AMERICA-FAYETTEVILLE	FAYETTEVILLE, NC	Yes	No	No	No	No

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<https://echo.epa.gov/detailed-facility-report?fid=28302DPNTFHIGHW>

From: Libelo, Laurence
Sent: Tuesday, May 30, 2017 10:13 AM
To: Pickrel, Jan <Pickrel.Jan@epa.gov>
Subject: NPDES permit question

Hi Jan,

Can you tell me where the wastewater from the Duopont/Chemours plant in Fayetteville NC goes? Do they have a pretreatment permit?

Thanks.

Laurence